

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**DECLARATION OF VAN D. TURNER, JR.  
IN SUPPORT OF APPOINTMENT AS LIAISON COUNSEL**

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I, Van D. Turner, Jr., declare the following under penalty of perjury:

1. I am a member of the law firm Turner Feild, PLLC (“TFP”), which is one of the law firms representing Plaintiffs in the above-captioned matter. I am a member in good standing in the State Bar of Tennessee and in the United States District Court for the Western District of Tennessee, Western Division. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to the facts stated herein.

2. I have prepared this declaration in response to the Court’s Order, ECF No. 609, directing counsel for Plaintiffs to detail and describe their involvement in this action.

3. TFP has been involved throughout all stages of this litigation in working on many substantive and significant tasks on behalf of the Class over the course of this matter, including:

- a. Evaluation of the original complaint prior to filing and the filing of the same, along with handling service of process issues and other preliminary matters;
- b. Researching and drafting Plaintiffs' opposition to Defendant Webb's motion to dismiss;
- c. Analyzing discovery requests and responses and motions to compel the same;
- d. Evaluating discovery responses and counseling on the standard approach of the local bar in addressing discovery issues;
- e. Analyzing, researching, and summarizing relevant orders from the Court;
- f. Assisting co-counsel in the preparation for oral arguments before the Court on reconsideration of motion to dismiss and motion to strike, including attending these arguments;
- g. Attending key in-person hearing and advising counsel on local rules and procedures;
- h. Attending multiple telephone conferences with co-counsel regarding discovery negotiations, mediation, and trial preparation; and
- i. Assisting with securing trial consultants, which included feedback on potential issues with local jury.

4. TFP's firm profile was attached as Exhibit 5 to the February 10, 2023, Saveri Declaration in Support of Plaintiffs' Motion to Appoint Lead Counsel (ECF No. 380-2; ECF No. 380-5) and is incorporated herein by reference. TFP has served as local counsel to multiple firms litigating in both local federal and state courts regarding various class action claims, including antitrust claims.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 24, 2024, in Memphis, Shelby County, Tennessee.

/s/ Van D. Turner, Jr. (per email consent dated 5/24/2024)  
Van D. Turner, Jr.